

Arbonne International

Deanna Raeber
Independent Consultant
Arbonne International

July 14, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Also sent to: <https://secure.commentworks.com/ftc-bizopNPR/>

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I know my fearful impression of the thought of lawsuit and I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with

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giving out personal information about individuals, without their permission or knowledge, to strangers. Sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes. I am a well-respected teacher and the 10 references would not be the problem. To me, this would be considered a breach in confidentiality of those I love, which IS enforceable by law.

I am still in my infancy as an Arbonne Independent Consultant, less than seven months. I became a Consultant only after my personal rosacea was finally not adversely affected, because I finally found products with which to clean and moisturize my highly sensitive skin. A credentialed teacher by trade, I have to be able to share these products to save other faces from over-the-counter products that inflame, which these really do not, of those I have taught, know, and love. I left teaching and this is my future source of potential income. Since starting my Arbonne business, I have developed a team of 4 Independent Consultants so far and and together we are hoping to help our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Deanna Raeber
Independent Consultant
Arbonne International

Arbonne Safe Business